

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**KIMBERLEE WILLIAMS, et al.**

Plaintiffs,

vs.

**BASF CATALYSTS LLC, et al.**

Defendants.

No. 2:11-cv-01754 (JLL) (JAD)

CIVIL ACTION

**DECLARATION OF  
CHRISTOPHER M. PLACITELLA  
ESQ. IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
CLASS CERTIFICATION**

I, Christopher M. Placitella, Esq., pursuant to 28 USCS § 1746, hereby declare as follows:

1. I am an attorney at law duly admitted to the bar of the State of New Jersey and the United States District Court for the District of New Jersey

2. I am a shareholder with the law firm of Cohen, Placitella & Roth, P.C, am entrusted with the representation of the plaintiffs in the captioned matter, and am fully familiar with the facts set forth herein.

3. The following documents listed below and annexed to this declaration are true and correct copies:

Exhibit No.	Description
A	The executed Settlement Agreement dated March 13, 2020.
B	Declaration of Mediator and Former United States District Court Judge Layn R. Phillips.

Exhibit No.	Description
C	Proposed Plan of Distribution of the Williams Emtal Talc Settlement Fund.
D	Declaration of Daniel Myer.
E	Declaration of Mark Zabel.
F	Declaration of the Hon. Marina Corodemus, J.S.C. (retired).
G	Declaration of Edgar C. Gentile.
H	Transcript of the January 15, 2018 Oral Argument.
I	Class Plaintiffs' Rule 26(a)(1) Initial Disclosures.
J	Plaintiff Marilyn L. Holley's Response to BASF Catalysts LLC's Second Sets of Interrogatories.
K	Proposed Long-form Notice.
L	Proposed Short-form Notice.
M	Declaration of Orran L. Brown, Sr.
N	Declaration of Gayle Williams In Support of Motion for Preliminary Approval of Class Action Settlement.
O	Declaration of Kimberlee Williams In Support of Motion for Preliminary Approval of Class Action Settlement.

Exhibit No.	Description
P	Declaration of Marilyn L. Holley In Support of Motion for Preliminary Approval of Class Action Settlement.
Q	Declaration of Sheila Ware In Support of Motion for Preliminary Approval of Class Action Settlement.
R	Declaration of Donnette Wengerd In Support of Motion for Preliminary Approval of Class Action Settlement.
S	March 18, 2020 agreement with Howard G. Sloane.
T	March 18, 2020 agreement with Thomas D. Halket.
U	March 18, 2020 agreement with Ira Dembrow.
V	May 15, 2018 Deposition Transcript of Thomas W. Bevan.
W	April 15, 2017 Deposition Transcript of Marilyn Holley.
X	March 12, 2018 Deposition Transcript of Donnette Wengerd.
Y	April 5, 2018 Deposition Transcript of Gayle Williams.
Z	April 17, 2018 Deposition Transcript of Sheila Ware.
AA	Transcript of the February 23, 2018 Oral Argument.
BB	Resume of Plaintiffs' Counsel.
CC	March 18, 2020 agreement with Arthur A. Dornbusch.

Exhibit No.	Description
DD	Declaration of Rosanne Chernick In Support of Motion for Preliminary Approval of Class Action Settlement.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: July 16, 2020

/s/ Christopher M. Placitella

CHRISTOPHER M. PLACITELLA